

JOHN T. GORMAN
Federal Public Defender
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Attorney for Defendant
NATARAJAN GURUMOORTHY

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CR 08-00043
)	
Plaintiff,)	MOTION TO SCHEDULE CHANGE OF
)	PLEA HEARING AND VACATE TRIAL
vs.)	DATE
)	
NATARAJAN GURUMOORTHY,)	
)	
Defendant.)	
_____)	

COMES NOW the defendant, NATARAJAN GURUMOORTHY, through counsel, John T. Gorman, Federal Public Defender, and moves this Honorable Court to schedule a hearing for defendant's change of plea from not guilty to plea of guilty and to vacate the trial date currently scheduled for October 28, 2008. There is no written plea agreement in this case.

My client is also prepared to stipulate to following facts at the Change of Plea hearing:

On or about August 15, 2008, in the District of Guam, I knowingly and with the intent to defraud, did possess 15 or more counterfeit and unauthorized access devices, namely 60 credit card numbers and associated personal identification numbers, and this conduct had an affect on interstate or foreign commerce. Also, on or about August 15, 2008, in the District of Guam, I knowingly and with the intent to defraud, did possess device making equipments, namely, 1 Toshiba laptop computer (ser. # 66113488W) and 1 Maxpos reader/encoder,

and this conduct had an affect on interstate or foreign commerce. The above noted equipment was to be used in the production of counterfeit access devices. I also agree to forfeit to the United States the proceeds from this illegal activity, including but not limited to the Toshiba laptop computer and Maxpos reader/encoder noted above, and miscellaneous power cords.

DATED: Mongmong, Guam, September 2, 2008.

/s/ JOHN T. GORMAN



John T. Gorman

Federal Public Defender

District of Guam

Phone: (671) 472-7111

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GMT + 10:00 Hours

Attorney for Defendant
NATARAJAN GURUMOORTHY

CERTIFICATE OF SERVICE

I, JOHN T. GORMAN, hereby certify that a true and exact copy of the foregoing document was filed with U.S. District Court and electronically served by the U.S. District Court Clerk's Office to the following on September 2, 2008:

MARIVIC P. DAVID
Assistant United States Attorney
Sirena Plaza
108 Hernan Cortez, Ste. 500
Hagatna, Guam 96910

Attorney for Plaintiff
UNITED STATES OF AMERICA

ROSSANNA VILLAGOMEZ-AGUON
Chief U.S. Probation Officer
U.S. Probation Office
Districts of Guam and NMI
2nd Floor, U.S. District Court

DATED: Mongmong, Guam, September 2, 2008.

/s/ JOHN T. GORMAN



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